

Remarks

In response to the Office Action dated March 30, 2006, Applicants elect for prosecution in this application Species I. Applicants submit that Claims 1-25, 47, and 48 read on Species I.

The requirement for election is traversed because Species I and Species II are clearly related. Applicants respectfully submit that independent Claims 1, 21, 26, 45, 47, and 48 are generic and readable on Species I and Species II. Moreover, the Office Action has not shown the Claims of Species I and the Claims of Species II are independent or distinct. Particularly, the Office Action has not shown that the process as claimed can be practiced by another materially different apparatus or by hand, or that the apparatus as claimed can be used to practice another and materially different process. Rather, the Examiner only supports the election requirement with the conclusory statement that “[t]he species are independent or distinct because the claims set forth different methods and schemes to prioritizing debt collections.” The Claims of Species I are directed to systems for prioritizing debt collections and the Claims of Species II are directed to methods and computer programs for prioritizing debt collections. Applicants submit that the methods and computer programs as claimed cannot be practiced by another materially different apparatus or by hand. Applicants further submit that the systems as claimed cannot be used to practice another and materially different process.

Moreover, Applicants submit that a thorough search and examination of Species I would be relevant to the examination of Species II and would not be a serious burden on the Examiner. Indeed, the Examiner has already searched Claims 1-46 and new Claims 47 and 48 do not include any recitations that are not recited in one or more of Claims 1-46. Moreover, the Claims of Species I are directed to systems for prioritizing debt collections and the Claims of Species II are directed methods and computer programs for prioritizing debt collections. Applicants submit that a search of the subject matter of the Claims of Species II would also include the subject matter of the Claims of Species I, or else the search would be incomplete.

Additionally, requirements for election are not mandatory under 35 U.S.C.

For at least the reasons set forth above, Applicants respectfully request that the election requirement be withdrawn.

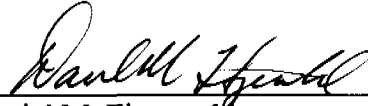
Applicants further submit that U.S. Patent No. 6,098,052 (Kosiba) does not describe nor suggest the recitations of Claims 1-48 and as such, Claims 1-48 are in condition for allowance.

Applicants further submit that Claim 47 includes the recitations of independent Claim 1, allowable dependent Claim 14, and intervening dependent Claim 2. For at least this additional reason, Claim 47 is submitted as in condition for allowance.

Applicants also submit that Claim 48 includes the recitations of independent Claim 1, allowable dependent Claim 9, and intervening dependent Claim 2. For at least this additional reason, Claim 48 is submitted as in condition for allowance.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,



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